REMARKS

Claims 1 and 3-20 are pending in this application. For the reasons set forth below, Applicant respectfully requests reconsideration and immediate allowance of this application.

I. Telephone Interview Summary

A telephone interview was conducted on March 22, 2010. Those present at the interview were Examiner Gupta and the Applicant's representative, Jodi Hartman. Applicant's representative thanks Examiner Gupta for his time, for the courtesies extended during the interview, and for Examiner Gupta's efforts to move prosecution forward.

During the interview, the subject matter of the present application, the rejections of the Office Action, and the scope of the cited references were discussed. Applicant's representative and Examiner Gupta discussed the pending claims and the rejections to those claims over U.S. Patent No. 6,779,004 to Zintel (hereinafter "Zintel") in view of U.S. Patent No. 6,560,641 to Powderly (hereinafter "Powderly"). Examiner Gupta indicated that he would further consider the points discussed during the interview and the arguments set forth in this response. The pending claims are patentable over all of the cited references, individually, or in any hypothetical combination, for at least the reasons discussed during the interview on March 22, 2010.

II. Claim Rejections Under 35 U.S.C. §103

Claims 1 and 3-20 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Zintel in view of Powderly. This rejection is respectfully traversed.

A. Claims 1 and 3-8 are allowable.

Claim 1 recites, *inter alia*, that a method for communicating with a computer management device comprises transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard; receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the

computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

Zintel does not teach, suggest, or describe a method for communicating with a computer management device comprising the features recited by claim 1. On the contrary, Zintel describes a method for automatically installing or configuring a peer networking-to-host/peripheral adapter (UPnP bridge) for adapting devices operating under a host-peripheral connectivity model for operation within a distributed device control model having peer networking connectivity when a peripheral device is connected to a host. Zintel describes that the UPnP bridge, in effect, operates virtually as a set of controlled devices in the device control protocol which allows the UPnP bridge to communicate in device control protocol with other peer devices that are networked with the host, convert the device control protocol communications from the peer devices into the peripheral device's host peripheral protocol such that the peer devices can control the peripheral device, and convert communications in the host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices.

This is not analogous to the method recited by claim 1 for a number of reasons. First, Zintel fails to teach, suggest, or describe determining, at a computer management device, whether one or more vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer. Instead, Zintel describes converting device control protocol communications from peer devices into a peripheral device's host peripheral

protocol such that the peer devices can control the peripheral device and converting communications in host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices, without teaching, suggesting, or describing determining whether one or more vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 1.

The Office Action appears to try and equate the functionality of the Rehydrator of Zintel to these recitations of claim 1. Zintel describes that the Rehydrator operates as a universal adapter to provide a programmatic interface to any service-specific protocol of a remote computing device. Nowhere does Zintel teach, suggest, or describe that the functionality of the Rehydrator includes determining whether one or more vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 1.

Further, Zintel fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 1. As discussed above, Zintel fails to teach, suggest, or describe determining whether vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 1. It follows then that Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 1.

The Office Action appears to try and equate the functionality of the Service State Table (SST) of Zintel to these recitations of claim 1. Zintel describes that every running instance of a Service includes a SST which represents the current state of the Service. For example, Zintel describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the functionality of the SST includes in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 1.

Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device. As noted above, Zintel fails to teach, suggest, or describe determining whether vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 1. It follows then that Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

Again, the Office Action appears to try and equate the functionality of the SST of Zintel to these recitations of claim 1. Zintel describes that every running instance of a Service includes a SST which represents the current state of the Service. For example, Zintel describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the functionality of the SST includes in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device

attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

Although the Office Action rejects claim 1 as allegedly being unpatentable over the combined teachings of Zintel and Powderly, the Office Action does not set forth the deficiency of Zintel for which the teachings of Powderly cure. Applicant respectfully asserts that Powderly fails to cure the above-identified deficiencies of Zintel. Powderly describes a method for providing, via a network, emulation of a console of a host computer system on another, remotely located computer system including providing an adapter card connected to an input/output (I/O) bus of a host computer system where the adapter card comprises a peripheral device interface controller to which peripheral devices can be connected and through which the host computer system can access the peripheral devices.

This is not analogous to the method recited by claim 1 because, like Zintel, Powderly fails to teach, suggest, or describe determining, at a computer management device, whether one or more vendor specific commands are commands intended for accessing data on a device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device. In fact, Powderly fails to teach, suggest, or describe an emulated device as recited by claim 1.

For at least the reasons given above, claim 1 is allowable over the combined teachings of Zintel and Powderly. Since claims 3-8 depend from claim 1 and recite additional features, claims 3-8 are also allowable over the combined teachings of Zintel and Powderly. Accordingly, withdrawal of the rejection is respectfully requested.

Claims 3-8 are also allowable for further reasons. For example, claim 5 recites that utilizing the received vendor specific commands for communicating with the computer management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer comprises determining coordinates of a user input cursor on the remote computer; and returning the coordinates to the host computer in response to the received vendor specific commands.

The portions of Zintel relied upon by the Office Action describe providing event changes associated with services to subscribers. However, nowhere does Zintel teach, suggest, or describe that providing event changes associated with services comprises determining coordinates of a user input cursor on a remote computer and returning the coordinates to a host computer in response to the received vendor specific commands as recited by claim 5. Again, Powderly was not relied upon to reject claim 5, but even if it was, Powderly fails to cure the deficiencies of Zintel. For at least these further reasons, claims 3-8 are allowable over the combined teachings of Zintel and Powderly.

B. Claims 9-15 are allowable.

Claim 9 recites, *inter alia*, that a method for communicating with a computer management device comprises receiving at the computer management device, from an application programming interface of the host computer, one or more vendor specific commands directed toward the mass storage device, the vendor specific commands conforming to a second communication standard and transmitted to the computer management device over the communication link conforming to the first standard; determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to

determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

For reasons similar to the reasons provided above regarding claim 1, Zintel does not teach, suggest, or describe a method for communicating with a computer management device comprising the features recited by claim 9. On the contrary, Zintel describes a method for automatically installing or configuring a peer networking-to-host/peripheral adapter (UPnP bridge) for adapting devices operating under a host-peripheral connectivity model for operation within a distributed device control model having peer networking connectivity when a peripheral device is connected to a host. Zintel describes that the UPnP bridge, in effect, operates virtually as a set of controlled devices in the device control protocol which allows the UPnP bridge to communicate in device control protocol with other peer devices that are networked with the host, convert the device control protocol communications from the peer devices into the peripheral device's host peripheral protocol such that the peer devices can control the peripheral device, and convert communications in the host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices.

This is not analogous to the method recited by claim 9 for a number of reasons. First, Zintel fails to teach, suggest, or describe determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer. Instead, Zintel describes converting device control protocol communications from peer devices into a peripheral device's host peripheral protocol such that the peer devices can control the peripheral device and converting communications in host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices, without teaching, suggesting, or describing determining, at the computer management device, whether the received vendor specific

commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 9.

The Office Action notes that these recitations of claim 9 are rejected for the same reasons provided regarding claim 1. Thus, the Office Action appears to try and equate the functionality of the Rehydrator of Zintel to these recitations of claim 9. Zintel describes that the Rehydrator operates as a universal adapter to provide a programmatic interface to any service-specific protocol of a remote computing device. Nowhere does Zintel teach, suggest, or describe that the functionality of the Rehydrator includes determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 9.

Further, Zintel fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 9. As discussed above, Zintel fails to teach, suggest, or describe determining whether vendor specific commands are commands intended for accessing data on a mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 9. It follows then that Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 9.

The Office Action appears to try and equate the functionality of the Service State Table (SST) of Zintel to these recitations of claim 9. Zintel describes that every running instance of a

Service includes a SST which represents the current state of the Service. For example, Zintel describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the functionality of the SST in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device as recited by claim 9.

Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device. As noted above, Zintel fails to teach, suggest, or describe determining whether vendor specific commands are commands intended for accessing data on a mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 9. It follows then that Zintel also fails to teach, suggest, or describe in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 9.

Again, the Office Action appears to try and equate the functionality of the SST of Zintel to these recitations of claim 9. Zintel describes that every running instance of a Service includes a SST which represents the current state of the Service. For example, Zintel describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the functionality of the SST includes in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the

remote computer redirected from the remote computer to the computer management device as recited by claim 9.

Although the Office Action rejects claim 9 as allegedly being unpatentable over the combined teachings of Zintel and Powderly, the Office Action does not set forth the deficiency of Zintel for which the teachings of Powderly cure. Applicant respectfully asserts that Powderly fails to cure the above-identified deficiencies of Zintel. Powderly describes a method for providing, via a network, emulation of a console of a host computer system on another, remotely located computer system including providing an adapter card connected to an input/output (I/O) bus of a host computer system where the adapter card comprises a peripheral device interface controller to which peripheral devices can be connected and through which the host computer system can access the peripheral devices.

This is not analogous to the method recited by claim 9 because, like Zintel, Powderly fails to teach, suggest, or describe determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 9.

For at least the reasons given above, claim 9 is allowable over the combined teachings of Zintel and Powderly. Since claims 10-15 depend from claim 9 and recite additional features, claims 10-15 are also allowable over the combined teachings of Zintel and Powderly. Accordingly, withdrawal of the rejection is respectfully requested.

Claims 10-15 are also allowable for further reasons. For example, claim 13 recites that in response to determining that the one or more vendor specific commands are commands for obtaining coordinates of a user input cursor on the remote computer, determining coordinates of a user input cursor on the remote computer; and returning the coordinates to the host computer in response to the received vendor specific commands.

The portions of Zintel relied upon by the Office Action describe providing event changes associated with services to subscribers. However, nowhere does Zintel teach, suggest, or describe that providing event changes associated with services comprises determining coordinates of a user input cursor on a remote computer and returning the coordinates to a host computer in response to the received vendor specific commands as recited by claim 13. Again, Powderly was not relied upon to reject claim 13, but even if it was, Powderly fails to cure the deficiencies of Zintel. For at least these further reasons, claims 10-15 are allowable over the combined teachings of Zintel and Powderly.

C. Claims 16-20 are allowable.

As amended, claim 16 recites, *inter alia*, that a system for managing a host computer comprises the host computer supporting a communication link that conforms to a first communication standard and including an application programming interface, the application programming interface of the host computer operative to transmit one or more vendor specific commands that conform to a second communication standard over the communication link; and a management device for managing the host computer, the management device connected to the host computer via the communication link, the management device operative to emulate a mass storage device on the communication link, receive the vendor specific commands from the application programming interface of the host computer directed toward the mass storage device, determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer, utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input

cursor on the remote computer, and access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device.

Zintel does not teach, suggest, or describe a system for managing a host computer comprising the features recited by claim 16. On the contrary, Zintel describes a system including a peer networking-to-host/peripheral adapter (UPnP bridge) for adapting devices operating under a host-peripheral connectivity model for operation within a distributed device control model having peer networking connectivity when a peripheral device is connected to a host. Zintel describes that the UPnP bridge, in effect, operates virtually as a set of controlled devices in the device control protocol which allows the UPnP bridge to communicate in device control protocol with other peer devices that are networked with the host, convert the device control protocol communications from the peer devices into the peripheral device's host peripheral protocol such that the peer devices can control the peripheral device, and convert communications in the host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices.

This is not analogous to the system recited by claim 16 for a number of reasons. First, Zintel fails to teach, suggest, or describe a management device operative to determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer. Instead, Zintel describes that the UPnP bridge converts device control protocol communications from peer devices into a peripheral device's host peripheral protocol such that the peer devices can control the peripheral device and converts communications in host-peripheral protocol from the peripheral device into the device control protocol with peer networking connectivity such that the peripheral device controls other peer networking connectivity devices, without teaching, suggesting, or describing that the UPnP bridge or a management device determines whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management

device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16.

The Office Action notes that these recitations of claim 16 are rejected for the same reasons provided regarding claim 1. Thus, the Office Action appears to try and equate the functionality of the Rehydrator of Zintel to these recitations of claim 16. Zintel describes that the Rehydrator operates as a universal adapter to provide a programmatic interface to any service-specific protocol of a remote computing device. Nowhere does Zintel teach, suggest, or describe that the Rehydrator or a management device is operative to determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16.

Further, Zintel fails to teach, suggest, or describe a management device operative to utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16. As discussed above, Zintel fails to teach, suggest, or describe a management device operative to determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16. It follows then that Zintel also fails to teach, suggest, or describe a management device operative to utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16.

The Office Action appears to try and equate the functionality of the Service State Table (SST) of Zintel to these recitations of claim 16. Zintel describes that every running instance of a Service includes a SST which represents the current state of the Service. For example, Zintel

describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the SST or a management device is operative to utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16.

Zintel also fails to teach, suggest, or describe a management device operative to access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device. As noted above, Zintel fails to teach, suggest, or describe a management device operative to determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 16. It follows then that Zintel also fails to teach, suggest, or describe a management device operative to access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device as recited by claim 16.

Again, the Office Action appears to try and equate the functionality of the SST of Zintel to these recitations of claim 16. Zintel describes that every running instance of a Service includes a SST which represents the current state of the Service. For example, Zintel describes that the SST of a clock would likely represent the current time. Nowhere does Zintel teach, suggest, or describe that the SST or a management device is operative to access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to

the remote computer redirected from the remote computer to the management device as recited by claim 16.

Although the Office Action rejects claim 16 as allegedly being unpatentable over the combined teachings of Zintel and Powderly, the Office Action does not set forth the deficiency of Zintel for which the teachings of Powderly cure. Applicant respectfully asserts that Powderly fails to cure the above-identified deficiencies of Zintel. Powderly describes a system for providing, via a network, emulation of a console of a host computer system on another, remotely located computer system including an adapter card connected to an input/output (I/O) bus of a host computer system where the adapter card comprises a peripheral device interface controller to which peripheral devices can be connected and through which the host computer system can access the peripheral devices.

This is not analogous to the system recited by claim 16 because, like Zintel, Powderly fails to teach, suggest, or describe a management device operative to determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer, utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer, and access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device.

For at least the reasons given above, claim 16 is allowable over the combined teachings of Zintel and Powderly. Since claims 17-20 depend from claim 16 and recite additional features, claims 17-20 are also allowable over the combined teachings of Zintel and Powderly. Accordingly, withdrawal of the rejection is respectfully requested.

Claims 17-20 are also allowable for further reasons. For example, claim 20 recites that the management device is further operative to determine coordinates of a user input cursor on the

remote computer and return the coordinates to the computer in response to the received vendor specific commands in response to determining that the one or more vendor specific commands are commands for obtaining coordinates of a user input cursor on the remote computer.

The portions of Zintel relied upon by the Office Action describe that a server provides event changes associated with services to subscribers. However, nowhere does Zintel teach, suggest, or describe that by providing event changes associated with services, the server or a management device determines coordinates of a user input cursor on the remote computer and returns the coordinates to the computer in response to the received vendor specific commands in response to determining that the one or more vendor specific commands are commands for obtaining coordinates of a user input cursor on the remote computer as recited by claim 20. Again, Powderly was not relied upon to reject claim 20, but even if it was, Powderly fails to cure the deficiencies of Zintel. For at least these further reasons, claims 17-20 are allowable over the combined teachings of Zintel and Powderly.

CONCLUSION

In view of the foregoing remarks, Applicant respectfully submits that all of the pending claims in the present application are in condition for allowance. Reconsideration and reexamination of the application and allowance of the claims at an early date is solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact Applicant's undersigned attorney at the number below.

Respectfully submitted,

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